

REMARKS

Claims 1-18 are pending in the present application. Claims 3, 9, and 15 are amended. Reconsideration of the claims is respectfully requested.

I. 35 U.S.C. § 103, Obviousness, Claims 1-2, 4-8, 10-14, and 16-18

The Examiner has rejected claims 1-2, 4-8, 10-14, and 16-18 under 35 U.S.C. § 103 as being unpatentable over Bates et al. (U.S. Patent No. 6,557,015 B1) in view of Internet Explorer Screen Capture ("Screen Capture", Figures 1-5). This rejection is respectfully traversed.

The Examiner bears the burden of establishing a *prima facie* case of obviousness based on the prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). For an invention to be *prima facie* obvious, the prior art must teach or suggest all claim limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Independent claim 1 of the present invention, which is representative of independent claims 7 and 13, reads as follows:

I. A method of logically navigating within a multi-page HTML document on a web site, comprising the steps of:

installing a direction indicator relative to a reference link shown on a currently viewable page within the document on the web site;

surfacing said direction indicator prior to selection of said reference link in order to inform the user whether said link is logically forward or backward relative to content within the currently viewable page within the multi-page HTML document.

A. With regard to claim 1, the Examiner stated:

...Bates does not clearly state that the link is logically forward or backward relative to content within the currently viewable page within the multi-page HTML document. Screen Capture shows tool tips with arrows to indicate surfacing directions to inform the user whether said link is logically forward or backward within a current web site (tool tip 2 of fig. 3), which provides "Backward" and "Forward" buttons (element 2 of fig. 2 and element 3 of fig. 3) from Internet Explorer Browser (figs. 2-3). It would have been obvious at the time of the invention that a person with ordinary skill in the art would want to modify the Screen Capture tool tips in the active Web document trails to Bates to

provide visual tools in tracking navigation information relating to the current web site.

(Office Action, dated June 3, 2004, page 3).

Bates teaches a plurality of interlinked hypertext documents and permits a user to navigate from an origination hypertext document to a destination hypertext document simply by following the "trail". Col. 2, lines 55-59. Each hypertext document in the trail is interlinked with any document that immediately precedes or succeeds the document in the trail. Col. 6, lines 22-24. Consequently, the user creates the trail by visiting links within the web site placing it in linear or chronological order. This chronological trail in the Bates invention will allow for forward or backward movement through the links, but it will not inform the user whether the link will be logically forward or backward relative to content within the currently viewable page as recited in claim 1 of the current invention. Also, the current invention does not place the links in linear or chronological order because the reference link may be required to jump or skip several links within the multi-page HTML document to retrieve the appropriate content. And, Applicant's invention permits the user to jump to the appropriate information without previously visiting the link as is required in Bates.

As previously stated, the current invention provides the user with valuable information by informing the user whether said link is logically forward or backward relative to content within the currently viewable page. This is accomplished by installing a direction indicator relative to a reference link shown on a currently viewable page within the document as recited in claim 1 of Applicant's invention. The direction indicator is surfaced prior to selection of the said reference link in order to inform the user whether the link is logically forward or backward within the multi-page HTML document. For example, as stated in the Specification at page 1, lines 14-17 and page 2, lines 3-8, a user is able to know, before selecting a hyperlink, for example, in an online book, whether the link will take him or her back or forward in the book (an example of a multi-page HTML document). In the case of an online book, the user might like to know before making the jump, which direction he or she will be going in the book. The user may not want to follow the link if it would take him forward, since he or she might be reading the book "the old fashioned" way (front to back). However, if the link takes him backward, he might want to follow it, to re-enforce some concept he or she has already

seen but perhaps not sufficiently remembered. The Bates invention does not teach or suggest this function. Moreover, the Bates invention links several different documents together, not content within a currently viewable page within a multi-page HTML document as is taught in Applicant's current invention.

Furthermore, while Screen Capture demonstrates arrows to move forward or backward among previously visited web sites in a linear or chronological manner if the user desires to do so, this Screen Capture feature will not inform the user whether said link is logically forward or backward relative to content within the currently viewable page within a multi-page HTML document. Screen Capture and the included figures 1-5 shows the back/forward icons in the Microsoft Internet Explorer toolbar. These back/forward icons have directional arrows on them and a hover help that tells what page you will navigate to if selected. However, they simply go back to the last (immediately preceding) web page the user was previously viewing. This last page could actually be forward within the current web site. The back/forward icons in the Microsoft Internet Explorer toolbar have no way of logically navigating in the manner claimed by the present invention. Using the Microsoft Internet Explorer back/forward icons, a user could conceivably select the back icon and in effect go forward in a document. Thus, the back/forward icons are an example of the problem solved by Applicant's invention. Accordingly, neither Bates nor Screen Capture teaches or suggests the features recited in claim 1 of the current invention.

The mere fact that the prior art could be readily modified to arrive at the claimed invention does not render the claimed invention obvious; the prior art must suggest the desirability of such a modification. *In re Ochiai*, 71 F.3d 1565, 1570, 37 U.S.P.Q.2d 1127, 1131 (Fed. Cir. 1996); *In re Gordon*, 733 F.2d 900, 903, 221 U.S.P.Q. 1125, 1127 (Fed. Cir. 1984). Merely stating that the modification would have been obvious to one of ordinary skill without identifying an incentive or motivation for making the proposed modification is insufficient to establish a *prima facie* case. Claim 1 of Applicant's invention recites a method of informing the user whether the reference link within a multi-page HTML document is logically forward or backward relative to content within a currently viewable page. In contrast, Bates teaches a plurality of interlinked hypertext documents and permits a user to navigate from an origination hypertext document to a

destination hypertext document simply by following a trail. And, Screen Capture teaches arrows to move forward or backward among previously visited web sites in chronological order. However, there is no suggestion or incentive in the prior art to modify the two references to arrive at Applicant's invention.

In view of the above, Applicant submits that independent claims 1, 7, and 13 are not taught or suggested by Bates or Screen Capture. Claims 2-6, 8-12, and 14-18 are dependent claims depending on independent claims 1, 7, and 13, respectively. Applicant has already demonstrated claims 1, 7, and 13 to be in condition for allowance. Applicant respectfully submits that claims 2-6, 8-12, and 14-18 are also allowable, at least by virtue of their dependency on allowable claims.

Furthermore, these dependent claims include features not taught or suggested by the Bates or Screen Capture references. For instance, claims 5, 11, and 17 are examples of dependent claims that contain features not taught or suggested by the Bates or Screen Capture references.

B. With regard to method claim 5, system claim 11, and program product claim 17, the Examiner states that Bates in view of Screen Capture teaches a toggle capability to only allow an indicator in one direction (Only shows Backward button 4 of fig. 4 of Screen Capture). However, the forward and backward icons of the Microsoft Internet Explorer toolbar are automatically enabled as the user creates a history of sites or links previously visited. Consequently, no manual enablement or disablement of the icons is available to the user. Despite the Examiner's assertion, the Screen Capture reference toolbar forward icon is not accessible because the user has not traversed chronologically backward in the web site history to automatically enable a forward icon. Once the user clicks on the back button, the forward arrow will automatically emerge. Thus, there is no manual toggle ability to turn on or off the direction arrows of the Microsoft Internet Explorer in Screen Capture. As a result, Screen Capture does not teach or suggest the current invention as recited in claims 5, 11, and 17.

II. 35 U.S.C. § 103, Obviousness, Claims 3, 9, and 15

The Examiner has rejected claims 3, 9, and 15 under 35 U.S.C. § 103 as being unpatentable over Bates et al. (U.S. Patent No. 6,557,015 B1) in view of Internet

Explorer Screen Capture ("Screen Capture", Figures 1-5) as applied to claims 1-2, 4-8, 10-14, and 16-18 above, and further in view of Bates et al (U.S. Patent No. 5,877,766) (hereinafter referred to as Bates 2). This rejection is respectfully traversed.

Dependent claim 3 of the present invention, which is representative of dependent claims 9 and 15, reads as follows:

3. The method of Claim 2, wherein said arrow points upward to indicate movement backward and said arrow points downward to indicate movement forward within the multi-page HTML document.

With regard to claim 3, the Examiner stated:

...but modified active Web document trails of Bates does not show the arrow points upward to indicate movement backward and said arrow points downward to indicate movement forward within the web site. However, Bates 2 clearly demonstrates these features in his invention (e.g., 45 or 90 degree, col. 10 lines 46-56). It would have been obvious at the time of the invention that a person with ordinary skill in the art would want to have this highly desirable direction indicator of Bates'[s] navigation web structure in the modified active Web document trails of Bates to enhance visualization of a retrieve operation status (Abstract) based on different screen layouts, or display setups of a user.

(*Office Action*, page 5).

Although Bates 2 teaches, "a child node display element may extend in practically any direction from the parent node display element, e.g., based upon aesthetic considerations, or alternatively, node display elements may be constrained to extend in only a few predetermined directions (e.g., 45 or 90 degree increments)," it does not specify or assign a value or specific movement for the element. Whereas claim 3 of the current invention recites that an upward arrow designates backward movement in the multi-page HTML document relative to content within the currently viewable page and that the downward arrow designates forward movement within the document. Moreover, when the upward or downward arrow is surfaced prior to selection of the reference link, the user is informed whether said link is logically forward or backward relative to content within the currently viewable page within the multi-page HTML document. Hence, Bates, Screen Capture, and Bates 2 do not teach or suggest Applicant's invention.

III. Prior Art Made of Record and Not Relied Upon

The other prior art reference cited by the Examiner, but not relied upon, does not teach or suggest Applicant's invention either. Brown et al (US-6,557,015 and US-6,356,908) describes a plurality of links to linked pages in the database with thumbnail images of the linked pages near the link. Col. 2, lines 16-20. Yet, Brown does not show a way to inform the user whether the link is logically forward or backward relative to content within the currently viewable page within a multi-page HTML document, as does Applicant's invention. Consequently, Brown does not teach Applicant's invention.

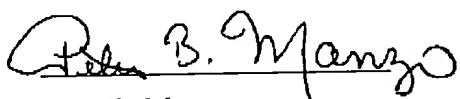
IV. Conclusion

It is respectfully urged that the subject application is patentable over the cited references and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 09/01/04

Respectfully submitted,



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